

**REMARKS**

Claims 1-8, 10-27, 37-39 and 40-47 are rejected under 35 USC §103(a) as being unpatentable over Terry (2001/0012346 A1) in view of newly cited Hogan (US patent 5,699,528). Reconsideration and withdrawal of these rejections are respectfully requested.

The Office Action of October 10, 2004 reiterates that the primary reference to Terry fails to disclose disputing a bill, creating a Credit Memo Request and submitting the credit memo request to the deploying company. For this subject matter, the Office relies on Hogan.

Hogan teaches methods and systems for bill delivery and payment over a network. The electronic bill payment services is disclosed, in Column 6, lines 65 to Column 7, line 8, to include:

... a grievance process whereby the subscriber may put the entire or a partial bill amount in dispute. To that end, the subscriber may select the "Grievance" option. In response, server computer 160 prompts at step 360 for a payment amount, for which the subscriber may enter any value from zero up to the full bill amount, exclusive. The subscriber is also prompted for an explanation for the deficiency which would be conveyed by EBSC to the appropriate payee. In any event, the payment entered by the subscriber is recorded by server computer 160 at step 370.

and is disclosed, in Column 11, lines 49-67, to provide for:

... a grievance process whereby the subscriber may put the entire or a partial bill amount in dispute. To that end, the subscriber may select the "Grievance" option. In response, server computer 160 prompts at step 360 for a payment amount, for which the subscriber may enter any value from zero up to the full bill amount, exclusive. The subscriber is also prompted for an explanation for the deficiency which would be conveyed by EBSC to the appropriate payee. In any event, the payment entered by the subscriber is recorded by server computer 160 at step 370.

The above two passages constitute the entire disclosure of Hogan's grievance process – other than corresponding verbiage in a few of Hogan's dependent claims.

As the Examiner will note, the independent claims have been amended to recite:

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enabling the customer to remotely dispute all or a portion of the displayed invoice by providing the customer with a user interface configured to enable the customer to create a credit memo request on the disputed invoice and configured to enable the customer to submit the customer-created credit memo request to the deploying company, the user interface being further configured to provide a plurality of reason codes for disputing the invoice, each of the reason codes being mapped to a corresponding user interface, the user interface displaying only information specific to its corresponding reason code.

Therefore, each of the independent claims recite that the user interface that enables the customer to create the credit memo request is also configured to provide the customer with a plurality of reason codes for disputing the invoice. Moreover, the claimed user interface is further recited to display only information specific to its corresponding reason code.

As stated in the first full paragraph of page 20 of the present specification,

After an appropriate reason code is selected by the customer 302, 304, 306 or the internal AR personnel, a user interface specific to the selected reason code is dynamically built and displayed to the requesting party. Indeed, each reason code S2a1, S2a2, S2a3, S2a4, S2b1, S2b2 (and any other reason code that may have been added) may be mapped to a separate user interface that prompts the user to enter the information relevant to the selected reason code, as shown at S4. Moreover, based upon the selected reason code, certain fields within the displayed user interface may be populated.

Therefore, through the use of the claimed user interfaces that correspond to the reason codes, the user is prompted to enter information that is relevant to the selected reason code. This is reflected in the claims, wherein it is recited that the user interface displays "only information specific to its corresponding reason code".

In direct contrast, Hogan only teaches to provide a one size fits all "grievance option" in which the customer is prompted for the payment amount and prose explanation for the deficiency (difference between the payment submitted and the full amount payable on the bill). Hogan does not teach or suggest enabling the customer to remotely dispute all or a portion of the displayed invoice by providing the customer with a user interface that provides a plurality of

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reason codes for disputing the invoice, each of the reason codes being mapped to a corresponding user interface, the user interface displaying only information specific to its corresponding reason code, as specifically claimed herein. In Hogan, the customer is only prompted to type in a paragraph explaining the partial or non-payment. Hogan does not teach or suggest different user interfaces corresponding the plurality of provided reason codes, as claimed herein.

It is, therefore, believed that a person of ordinary skill in the art, even if full possession of the applied Terry-Hogan combination, would not have been motivated to develop the claimed methods and systems whereby the customer is provided with user interfaces corresponding to the plurality of provided reasons codes for the purpose of disputing a bill, as claimed. Based upon the applied combination, such a person of ordinary skill would have little expectation of success in developing the claimed methods and systems.

In view of the acknowledged shortcomings of Terry, it falls to the secondary reference to Hogan to teach or to suggest the missing subject matter. As detailed above, this missing subject matter is nowhere taught or suggested in the secondary reference to Hogan. Therefore, the combination of Terry and Hogan cannot be effective to support the Office's outstanding §103(a) rejection, as the claimed invention would not have suggested itself to the person of ordinary skill in this art upon consideration of both references in combination. Such a combination might teach an interactive telecommunication (telephone) billing system (as taught by Terry), whereby disputes between the biller and the customer are handled by the expedient of the customer paying less than what is owed and providing a prose explanation for the partial or non-payment. For the foregoing reasons, it is respectfully submitted that the applied combination does not

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support the pending §103(a). In view of the foregoing, reconsideration and withdrawal of the outstanding obviousness rejections are respectfully requested.

The present amendment is believed to be properly enterable after final rejection, for the following reasons. At the outset, the present amendment places this case in condition for allowance, as the cited combination of references is not believed to teach or to suggest the recited structure and constituent steps of the independent claims, as developed above. Moreover, the nature of the amendments to the independent claims of the present application is such that no further search is required. Indeed, the amendments to the independent claims were taken solely from dependent claims thereof, claims that have been previously fully searched by the Examiner. Thus, all of the structure and steps recited in the amended independent claims have been fully searched by the Examiner. Of course, the Examiner may wish to perform an updated search prior to allowing this application. However, such a search is not necessitated by the nature of the amendments to the independent claims presented herewith. The present application is also allowable without undue additional consideration, as the subject matter incorporated into the independent claims is already familiar to the Examiner. By incorporating recitations in the independent claims (taken from previously pending dependent claims) that clearly distinguish the structure and constituent steps of the claimed methods and systems from that disclosed in the applied Terry-Hogan combination of references, the applicant believes that the applied rejection has been overcome in a manner that enables the application to be allowed without further search and/or consideration. Indeed, any further consideration that might be required is believed to be *de minimis*, as the present amendment is believed to place this application in condition for allowance without consideration of any new issues and/or subject matter. The number of claims has been decreased by the present amendment after final rejection. Therefore, the amendments

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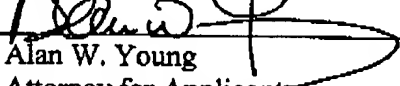
to the independent claims are believed to be such as to merit allowance of this application without requiring the applicant to expend additional fees to refile and re-prosecute this application.

Applicants' attorney believes that all claims are allowable as incorporating allowable subject matter and that the present application is now in condition for an early allowance and passage to issue. If any unresolved issues remain, the Examiner is respectfully invited to contact the undersigned attorney of record at the telephone number indicated below, and whatever is required will be done at once.

No fees are believed to be due with this communication. However, the Commissioner is authorized to charge any fees which may be required to Deposit Account No. 15-0635, referencing Docket No. OID-1999-180-01.

Respectfully submitted,

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